



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

E-Mailed: June 28, 2013
zabubakar@ci.banning.ca.us

June 28, 2013

Ms. Zai Abu Bakar
Community Development Director
99 East Ramsey Street
Banning, CA 92220

Review of the Draft Mitigated Negative Declaration (MND) for the 2008-2014 Banning Housing Element Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final environmental document as appropriate.

Based on a review of the Draft MND the project will increase the population of housing in the City of Banning by 932 units (based on the CalEEMod output files), however, it is unclear if this increase in residential units has been previously analyzed. Also, the tables and text discussion in the project description section of the Draft MND do not appear to be consistent; therefore, SCAQMD staff requests that the lead agency clarify the actual increase of housing units associated with the proposed project subject to CEQA review.

In the event that the CalEEMod files accurately reflect the project's air quality impacts, the project will result in significant regional air quality impacts from operational activities (i.e., area sources and mobile sources) associated with the project. Specifically, the CalEEMod summary sheets provided in the Draft MND indicate the project will exceed the SCAQMD's regional NOx and VOC emissions threshold for operational activities, however, the lead agency concluded that the project will result in less than significant air quality impacts. Based on the summary sheets the project will emit over 90 pounds per day (lbs/day) of NOx and 74 lbs/day of VOC's. The SCAQMD significance threshold for both of these criteria pollutants is 55lbs/day.

Further, the lead agency indicates that its significance determination is based on the conclusion that the project is consistent with regional plans (RTP/SCS and AQMP) resulting in insignificant air quality impacts. However, the SCAQMD CEQA significance thresholds are not intended to be individually selected and applied to projects. Therefore, the SCAQMD staff recommends that the lead agency revise the Draft MND to ensure that the air quality significance determination is based on all SCAQMD CEQA significance thresholds including the SCAQMD regional significance thresholds and clearly demonstrate that the project is consistent with regional plans (e.g.,

demonstrate that population, housing and land use projections are captured in the latest regional RTP/SCS and AQMP).

If upon revision of the Draft MND the lead agency determines the project will have significant air quality impacts based on SCAQMD's regional significance thresholds the SCAQMD staff recommends that the lead agency include additional mitigation measures pursuant to Section 15126.4 of the CEQA Guidelines. A list of additional operational mitigation measures recommend by SCAQMD staff is enclosed.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA document. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:DG

RVC130605-01
Control Number

Operational Mitigation Measures - Energy Efficiency

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
- Use light colored paving and roofing materials.
- Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- Limit the hours of operation of outdoor lighting.
- Install light colored “cool” roofs and cool pavements.
- Use electric appliances (e.g. stoves) and gardening equipment.

Operational Mitigation Measures - Transportation

- Provide electric car charging¹ stations for tenants and provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- Provide incentives to encourage public transportation and carpooling.
- Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices, and/or other incentives.
- Implement a rideshare program for employees in commercial/retail uses.
- Construct off-site bicycle facility improvements, such as bicycle trails linking the facility to designated bicycle commuting routes.
- Require the use of 2010 diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) upon project build-out.
- Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- Require the use of electric or alternative fueled maintenance vehicles.

Operational Mitigation Measures - Other

- Provide outlets for electric and propane barbecues in residential areas.
- Require use of electric lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Require use of water-based or low VOC cleaning products.

¹ For example see the Los Angeles Green Building Code:

http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf